

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Crim. No. 14-cr-20273

v.

Hon. George Caram Steeh

D-1 JOHNNY TROTTER, II, M.D.,
D-2 ANDREW HARDY, JR., M.D.
D-3 ELAINE LOVETT, and
D-4 MICHELLE FREEMAN

Defendants.

**STIPULATION FOR CONTINUANCE OF TRIAL
DATE AND FINDING OF EXCLUDABLE DELAY**

The United States, through its counsel, and defendants JOHNNY TROTTER, II, M.D., ANDREW HARDY, JR., M.D., ELAINE LOVETT, and MICHELLE FREEMAN, through their counsel, stipulate and respectfully request that the Court continue the January 27, 2015 trial date to May 26, 2015. Pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), and considering the factors listed in 18 U.S.C. § 3161(h)(7)(A), the parties further stipulate and respectfully request that the Court find as a period of excludable delay, the time from January 27, 2015 through the next scheduled trial date on May 26, 2015, so as to allow counsel time to prepare their clients' cases for trial and attend to other scheduled commitments.

The indictment against the defendants was unsealed on May 13, 2014. A trial date was originally set for July 22, 2014, and was then adjourned to January 27, 2015. Productions of documents have been ongoing, with some limited productions by the United States forthcoming.

The discovery in this matter is voluminous. The parties agree that the defendants' counsel require additional time to review discovery, investigate and prepare possible defenses to the charges, and prepare their clients' cases for trial. This motion is not made for purpose of delay, but so that defense counsel can render effective assistance of counsel. For these reasons, the parties also stipulate and respectfully request that the Court find that the period shall constitute excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A), and that the ends of justice served by this delay outweigh the best interests of the defendants and the public in a speedy trial. *Id.*

Respectfully submitted,

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Dated: December 18, 2014

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v.

Hon. George Caram Steeh

D-1 JOHNNY TROTTER, II, M.D.,
D-2 ANDREW HARDY, JR., M.D.
D-3 ELAINE LOVETT, and
D-4 MICHELLE FREEMAN

Defendants.

**ORDER FOR CONTINUANCE OF TRIAL
DATE AND FINDING OF EXCLUDABLE DELAY**

Upon this Court's consideration of the parties' stipulation:

IT IS HEREBY ORDERED that the pretrial motions deadline is reset to February 6, 2015, that the pretrial conference is set for March 23, 2015, at 9:30 a.m., and the jury trial in this matter is adjourned from January 27, 2015 until May 26, 2015 at 9:00 a.m. before District Judge George Caram Steeh;

IT IS FURTHER ORDERED that the time period between January 27, 2015 and May 26, 2015 shall be deemed excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161. Pursuant to 18 U.S.C. § 3161(h)(7)(A), and considering the factors listed in 18 U.S.C. § 3161(h)(7)(A), the Court concludes that the ends of justice are served by this delay because it enables defendants

adequate time to review discovery, investigate and prepare possible defenses to the charges, and prepare their clients' cases for trial. This Court finds that the ends of justice served by this delay outweigh the best interests of the defendants and the public in a speedy trial.

IT IS SO ORDERED.

Date: December 19, 2014

s/George Caram Steeh
HON. George Caram Steeh
United States District Judge